

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

MONSTER ENERGY COMPANY, a
Delaware corporation,

Plaintiff,

v.

R&R MEDICAL, LLC d/b/a BEAR
KOMPLEX, an Indiana limited liability
company,

Defendant.

Civil Case No. 2:21-cv-179-PPS-JPK

**DEFENDANT'S UNOPPOSED MOTION FOR THIRD EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant R&R Medical, LLC d/b/a Bear Komplex (“Defendant”), by counsel, respectfully moves the Court for an order extending its deadline to answer or otherwise respond to Plaintiff’s Complaint for Trademark and Trade Dress Infringement (the “Complaint”) an additional 14 days, to and including August 30, 2021. In support of this motion Defendant states:

1. Defendant’s original deadline to answer the Complaint was June 21, 2021.

Defendant filed its Notice of Initial Extension of Time to Respond to Complaint (Dkt # 8), which extended Defendant’s deadline to respond to the Complaint to July 19, 2021.

2. On July 19, 2021 the Court granted Defendant’s request for a second extension of time to respond to plaintiff’s complaint, making Defendant’s answer due August 16, 2021. That deadline has not expired.

3. The parties have been, and are still, conferring regarding voluntary resolution of this matter and request additional time to continue those discussions and negotiate the final terms of a written agreement. The requested 14-day extension will further the parties' legitimate interests in resolving this matter without incurring additional litigation expenses.

4. If granted, the requested extension will not interfere with the initial pretrial conference currently scheduled for September 23, 2021, or any deadlines associated therewith.

5. Counsel for Defendant has conferred with counsel for Plaintiff regarding this request, and Plaintiff does not oppose the requested extension.

6. This motion is made in good faith and not for any improper purpose.

WHEREFORE, for the foregoing reasons, Defendant R&R Medical, LLC d/b/a Bear Komplex respectfully requests that the Court enter an order extending its deadline to answer or otherwise respond to Plaintiff's Complaint to and including August 30, 2021.

Date: August 11, 2021

Respectfully submitted,

/s/ Louis T. Perry
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